

## COMMONWEALTH of VIRGINIA

Department of Criminal Justice Services

Shannon Dion Director

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March 26, 2020

## Dear DCJS Partners:

On behalf of everyone at the Department of Criminal Justice Services (DCJS), our thoughts go out to all those impacted by COVID-19. First and foremost, we would like to thank all of our sub-recipients for your resilience, patience, and efforts to stop the spread and keep communities safe. While the environment around us is uncertain and ever-changing, we are committed to ensuring funded programs have the clarity they need during this unprecedented time. We hope that this message can alleviate some of the questions you may have.

Effective March 16, 2020, DCJS has moved to maximum telework capacity. All staff are working remotely and will be available to assist grantees, stakeholders, and the public during this period. Below, we share some very important updates from the Office of Justice Programs (OJP) regarding funded services, reimbursements, and additional information regarding the steps DCJS has taken to mitigate issues as a result of this pandemic.

**Grant Reimbursements**: The Grants Management Online Information System (GMIS) will remain in service. Submission of financial reports and the processing of reimbursements will continue as normal. If you are facing extraordinary circumstances and there is a critical need to expedite a reimbursement, please contact your DCJS Grant Monitor. Requests will be reviewed on a case-by-case basis and allowances will be made so that you can meet your financial obligations. We are here to work with you and assist as we navigate the circumstances.

**Programmatic and Financial Monitoring**: Until otherwise notified, all planned on-site monitoring will be conducted as remote monitoring or postponed to a later date. You will be contacted by your DCJS Grant Monitor to make alternative arrangements. If your organization is unable to participate in remote monitoring due to operational limitations, you may request postponement to a later date.

**Programmatic and Financial Reporting**: For sub-recipients unable to meet the April 15, 2020 deadline, for the reporting period January 1 – March 31, 2020, DCJS is willing to provide a two-week extension. However, grant funds will not be disbursed unless a financial report has been submitted. Please note that at this time, due dates for reports for the remaining fiscal year are unchanged. As noted earlier, if you are facing extraordinary circumstances and there is a critical need to expedite a reimbursement, please contact your DCJS Grant Monitor.

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Conferences, Events, and Other Gatherings: For conference attendance, meetings, trainings, and other gatherings that are scheduled in the near quarter, sub-recipients should work with their DCJS Grant Monitor to address issues resulting from postponed or canceled meetings, such as using grant funds to cover hotel or travel-related cancellation fees and penalties. Please do everything possible to mitigate potential expenses by canceling as quickly as you can and be sure to keep all documented attempts at requested reimbursements. Sub-recipients should try to have the airline reimburse the canceled ticket(s) in cash. However, if the airline will only refund the cancellation as a credit, the sub-recipient should apply the credit to a future trip for the same grant or project. If that is not possible, the sub-recipient should use the credit for another program or project and reimburse the original grant or project with the equivalent dollar amount. If neither of those options is possible, then the sub-recipient should process the trip as a cancellation, which DCJS approves to be charged to the grant due to this mitigating circumstance. Please document these such changes via budget amendment request in the Grants Management Online Information System (GMIS) for record keeping purposes.

Interruptions in Performance of Work Under the Grant: Sub-recipients should review the DOJ Grants Financial Guide and the Part 200 Uniform Requirements (2 C.F.R. Part 200, as adopted by DOJ) (see, for example, 2 CFR 200.430 and 2 C.F.R. 200.431, under Subpart E – Cost Principles), and the grantee's (or subrecipient's/subgrantee's) established policies, to help in determining how the grantee's personnel costs may be treated during any period(s) of interruption to the performance of work under the award. You should direct any questions about allowability of costs to your DCJS Grant Monitor. The Government Printing Office also maintains electronic copies of the Code of Federal Regulations at <a href="https://www.gpo.gov/fdsys/browse/collectionCfr.action">https://www.gpo.gov/fdsys/browse/collectionCfr.action</a> and e-CFR at <a href="https://www.ecfr.gov/cgi-bin/ECFR?page=browse">https://www.ecfr.gov/cgi-bin/ECFR?page=browse</a>.

**Award Extensions**: DCJS will examine the need to extend other project reporting as the need arises and remain flexible to issue exceptions on a case-by-case basis in accordance with 2 CFR § 200.102, Exceptions. DCJS will evaluate if these flexibilities (i.e. no cost extensions) should be extended to sub-recipients whose operations have been adversely impacted in the emergency response related to COVID-19 at a later date. Please continue to implement your project goals and objectives within the award period. Refer to the DOJ Grants Financial Guide for additional information and consult with your Grant Monitor as needed.

**Leave Policies & Alternative Work Solutions**: Our federal funders have provided guidance regarding sub-recipients who may have to reduce services due to a health crisis resulting in quarantines. We have advised programs that they should use their existing leave policies to address employee absences. If you do not currently have policies regarding working remotely and paid administrative leave, you may wish to develop them as soon as possible. Provided your organization has policies in place and all staff (federally funded and non-federally funded) are treated equally, we can continue to reimburse the funded project even if services are temporarily reduced. In addition to completing the budget amendment form to indicate personnel changes, please send your revised policies to your DCJS Grant Monitor.

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**Budget Amendments**: DCJS will allow submission of budget amendments on current grants (FY20/CY20) to support necessary costs in response to COVID-19. The limit on budget amendments has been lifted. This can include technology support for personnel, reimbursements to personnel for use of personal technology at home, emergency client assistance funds, or emergency rental assistance to clients, as examples. DCJS encourages programs to evaluate their current budgets to shift any planned travel funding to other cost categories. Please maintain documentation of all changes and submit any budget amendments or questions directly to your DCJS Grant Monitor.

**System for Award Management (SAM) Registration**: OJP has informed us that they will provide 60-day extensions to <u>SAM.gov</u> registrations with expiration dates between 3/19/2020 and 5/17/2020 (the extensions will automatically be initiated). This effort is expected to be completed by 3/28/2020.

**Single Audit Submission**: In cases where OJP serves as the cognizant agency or has oversight for a recipient's audit, it will allow grant recipients that have fiscal year-ends through June 30, 2020 and that have not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2020, an extension of six (6) months beyond the normal due date. Please note that recipients taking advantage of this extension would still qualify as a "low-risk auditee" under the criteria of 2 CFR § 200.520 (a)- Criteria for a low-risk auditee.

**Information Systems/Anti-virus Protection**: DCJS wants to advise all sub-recipients to remain vigilant for scams related to COVID-19. Please ensure that all computer equipment purchased with grant funds is protected with anti-virus software. Cyber criminals may send emails with malicious attachments or links to fraudulent websites to pilfer victims into revealing sensitive information or donating to fraudulent charities or causes. It is advisable to exercise caution in handling all emails with COVID-19 related subject line, attachment or hyperlink, and be very wary of social media pleas, texts, or calls related to COVID-19.

**Information and Resources**: DCJS will continue to provide updates to you as additional guidance from federal program offices develops. For more information on COVID-19, please visit <a href="https://www.virginia.gov/coronavirus-updates/">https://www.virginia.gov/coronavirus-updates/</a> or <a href="https://www.virginia.gov/coronavirus-updates/">www.dcjs.virginia.gov/coronavirus-updates/</a> or <a href="https://www.virginia.gov/coronavirus-updates/">www.dcjs.virginia.gov/coronavirus-updates/</a> or <a href="https://www.virginia.gov/coronavirus-updates/">www.virginia.gov/coronavirus-updates/</a> or <a href="https://www.virginia.gov/coronavirus-updates/">https://www.virginia.gov/coronavirus-updates/</a> or <a href="https://www.virginia.gov/coronavirus-updates/">https://www.virginia.gov/coronavirus-updates/</a> or <a href="https://www.virginia.gov/coronavirus-updates/">www.virginia.gov/coronavirus-updates/</a> or <a href="https://www.virginia.gov/coronavirus-updates/">https://www.virginia.gov/coronavirus-updates/</a> or <a href="https://www.updates/">https://www.updates/</a> or <a href="https://www.updates/">https://www.updates/</a> or <a href="https://www.updates/">https://www.updates/</a> or <a href="https://www.updates/">https://www.updates/</a> or <a href="https

Thank you for your patience and partnership with us during this unusual situation. We truly want the health and well-being of your staff, volunteers, and those you serve to be the first priority. Your best contact during this time is your DCJS Grant Monitor. Please let them know if you have any questions or concerns.

Sincerely,

**Shannon Dion** 

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